

The FCC Competition Rules adopt a specific TSLRIC methodology for determining the forward-looking economic cost of providing unbundled network elements. (47 C.F.R. §51.505, 51.511) The FCC has chosen to call this methodology TELRIC, to reflect the fact that it applies to "elements" rather than "services."

The FCC Competition Rules require that any price established by a state commission for an unbundled network element may not exceed the forward-looking economic cost per unit of providing the element, as shown by a cost study that complies with the FCC's TELRIC methodology. (47 C.F.R. §51.503, 51.505(e)) That rule specifically prohibits the consideration of embedded costs, retail costs, opportunity costs, or revenues to subsidize other services in the calculation of the forward-looking economic cost of an element. (47 C.F.R. §51.505(d)) The rule does permit a reasonable allocation of forward-looking common costs (47 C.F.R. §51.505(c)), although the FCC recognizes that the level of such costs will likely be small when they are allocated to "elements" rather than "services." (FCC Competition Order, ¶678, 690) The rules also require that such rates be set on a geographically deaveraged basis, for at least three cost-related rate zones. (47 C.F.R. §51.507(f))

The FCC Competition Rules put the burden of proof with respect to the level of both direct costs and common costs on the incumbent LEC, which has superior access to the information necessary to make the required cost calculations. (47 C.F.R. §51.505(e); see FCC Competition Order, ¶680, 695) To the extent that the cost information made available to the Commission by GTEFL does not support the adoption of a rate consistent with the prescribed cost methodology, the Commission may establish an interim rate that is consistent with the proxies specified in 47 C.F.R. §51.513. (47 C.F.R. §51.503)

Attachment IV

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

-000-

In the Matter of the Application of)
TCG-San Francisco (U-5454-C),)
TCG-Los Angeles (U-5462-C), and)
TCG-San Diego (U-5389-C) for)
Arbitration Pursuant to § 252(b))
of the Telecommunications Act of 1996)
to Establish an Interconnection)
Agreement with GTE California)
Incorporated)

A. 96-08-013

**RESPONSE OF GTE CALIFORNIA INCORPORATED (U-1002-C)
TO APPLICATION FOR ARBITRATION**

Pursuant to Section 252(b) of the Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996) (the Act), GTE California Incorporated (U-1002-C) (GTEC) respectfully submits this Response to the Application for Arbitration filed by TCG-San Francisco (U-5454-C), TCG-Los Angeles (U-5462-C), and TCG-San Diego (U-5389-C) (collectively, TCG).

GENERAL

1. GTEC concurs that TCG has requested negotiations under Section 251 of the Act.

2. GTEC disputes that TCG has engaged in good faith negotiations with regard to its current proposal set forth in the TCG/Pacific Bell Agreement (Exhibit 9 to the Application), as modified by the Application. As the Application states (at page 5), TCG did not send such a proposal to GTEC until July 22, 1996;

the parties were not able to meet to discuss this new proposal before TCG filed its Application in this matter.

3. This Response is keyed to the TCG/Pacific Bell Agreement, which TCG requests this Commission to adopt (with some substantive modifications) for TCG and GTEC. The TCG/Pacific Bell Agreement is now pending approval before the Commission.

4. TCG's Application raises numerous and complex issues and, as mentioned in ¶ 2, above, GTEC only recently received the TCG/Pacific Bell Agreement proposal. In this Response, GTEC states generally its position on the issues raised by TCG's proposal. In accordance with the bench ruling of the Administrative Law Judge (ALJ) on August 23, 1996, GTEC will provide a more detailed response with its prefiled testimony on August 27, 1996. Also in accordance with the ALJ's bench ruling, GTEC will review TCG's proposed agreement with respect to its compliance or non-compliance with the Act and Federal Communications Commission (FCC) rules, specifically including the *FCC Local Competition Order*.¹ This Response incorporates by reference GTEC's prefiled testimony and materials to be submitted August 27, 1996.

5. In the spirit of resolving as many issues as possible prior to arbitration, GTEC and TCG will engage in face-to-face negotiations in Irving, Texas beginning August 26, 1996. As part of these negotiations, GTEC has provided to TCG its "model"

¹ In re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers, FCC 96-325, in CC Docket Nos. 96-48, 95-185 (released August 8, 1996).

interconnection, unbundling and resale agreement as a counterproposal to the TCG/Pacific Bell agreement. The parties are hopeful that many, if not all, issues will be resolved in these negotiations prior to hearing on this matter.

6. GTEC reserves the right to modify its positions before final submission to the Commission. For example, as noted in ¶ 5, above, the parties are continuing to negotiate and this may alter or narrow the scope of the hearing on this matter.

7. Except as will be set forth with its prefiled testimony, this Response does not address the FCC's recent *FCC Local Competition Order*. The *FCC Local Competition Order* will properly be subject to judicial review. In addition, the *FCC Local Competition Order* will not be effective until thirty (30) days after publication of a summary of the Order in the Federal Register. *FCC Local Competition Order*, ¶ 1442. As of the date of filing this Response, the required summary has not been published in the Federal Register and therefore the Order could not be effective prior to September 25, 1996. GTEC also anticipates that various parties may seek a federal court stay of the Order pending appeal. If such a stay is granted, the Order would not become effective until after the federal appellate court completes judicial review.

8. GTEC requests the opportunity to provide briefs in this matter at the conclusion of the hearing.

OBLIGATIONS UNDER THE ACT

9. The Act is intended to promote competition in the local exchange market by imposing certain requirements upon (a) all telecommunications carriers, (b) all local exchange carriers (LECs), and (c) all incumbent local exchange carriers (ILECs). These obligations are set forth in Sections 251(a), (b) and (c), respectively.

Most of the issues presented in this arbitration are governed by the ILEC obligations contained in Section 251(c), which sets forth the standards under which the six duties imposed on ILECs will be judged. In summary, Section 251(c) requires ILECs:

- (1) to negotiate in good faith (it also requires that the requesting carrier negotiate in good faith);
- (2) to provide interconnection for the transmission and routing of exchange service and access at any technically feasible point on just, reasonable and nondiscriminatory rates, terms and conditions;
- (3) to provide, for the provision of telecommunications service, unbundled access at any technically feasible point on just, reasonable and nondiscriminatory rates, terms and conditions;
- (4) to offer for resale at wholesale rates services the ILEC provides to end users;
- (5) to provide notice of network changes that would affect interoperability; and
- (6) to provide for collocation on just, reasonable and nondiscriminatory rates, terms and conditions.

See Section 251(c)(1)-(6).

10. While on August 8, 1996, the FCC released its *FCC Local Competition Order* (which is not yet effective), Section 251(d)(3) of the Act nonetheless allows state commissions the power to

establish their own rules governing interconnection and unbundled access (in accordance with their state statutory jurisdiction and authority), so long as the state rules do not "substantially" prevent the implementation and purposes of the Act. Section 251(d)(3) provides that:

(d)(3) Preservation of state access regulations. In prescribing and enforcing regulations to implement the requirements of this section, the Commission shall not preclude the enforcement of any regulation, order, or policy of a State commission that --

(A) establishes access and interconnection obligations of local exchange carriers;

(B) is consistent with the requirements of this section; and

(C) does not *substantially prevent* implementation of the requirements of this section and the purposes of this part

(Emphasis added.)

11. The Act commits to state commissions the exclusive power to determine prices for interconnection and unbundled elements and to determine avoided costs for resold services:

(d) *Pricing Standards.*

(1) Interconnection and network element charges. Determinations by a State commission of the just and reasonable rate for the interconnection of facilities and equipment for purposes of subsection (c)(2) of section 251, and the just and reasonable rate for network elements for purposes of subsection (c)(3) of such section --

(A) shall be:

(i) based on the cost (determined without reference to a rate-of-return or other rate-based proceeding) of providing the interconnection or network element (whichever is applicable), and

(ii) nondiscriminatory, and

(B) may include a reasonable profit.

(2) Charges for transport and termination of traffic.

(A) In general. For the purposes of compliance by an incumbent local exchange carrier with section 251(b)(5), a *State commission* shall not consider the terms and conditions for reciprocal compensation to be just and reasonable unless --

(i) such terms and conditions provide for the mutual and reciprocal recovery by each carrier of costs associated with the transport and termination on each carrier's network facilities of calls that originate on the network facilities of the other carrier; and

(ii) such terms and conditions determine such costs on the basis of a reasonable approximation of the additional costs of terminating such calls.

* * *

(3) Wholesale prices for telecommunications services. For the purposes of section 251(c)(4), a *State commission* shall determine wholesale rates on the basis of retail rates charged to subscribers for the telecommunications service requested, excluding the portion thereof attributable to any marketing, billing, collection, and other costs that will be avoided by the local exchange carrier.

Section 252(d)(1)-(3) (emphasis added).

DISPUTED ISSUES - PRICE

12. This proceeding, distilled to its essence, presents three fundamental issues that govern all others:

(1) Whether the prices (a) at which TCG is afforded interconnection with GTEC's network, (b) at which TCG purchases the services of GTEC for resale, and

(c) at which TCG accesses GTEC's network elements, will compensate GTEC fully for the loss or use of its property and will promote efficient entry into the local telephone marketplace;

- (2) Whether GTEC will be able to recover all of the costs associated with reengineering and modifying its network and systems to accommodate TCG's demands, assuming, of course, that GTEC has a legal obligation to meet these demands; and
- (3) Whether it is technically feasible at this time for GTEC to accommodate all of TCG's requests at a cost that TCG is willing to pay.

13. TCG's proposed agreement would require that GTEC provide interconnection, services for resale and unbundled network elements for prices at or below cost, thereby requiring GTEC's shareholders and customers to subsidize TCG's entry into the local telecommunications market. Not only is this inconsistent with the requisites of the Act, but both the United States Constitution and the Constitution of the State of California require that GTEC be allowed to recover its reasonable costs and a reasonable return on its investment.

At a minimum, constitutional law and the Act itself (properly construed in light of constitutional strictures) require that GTEC be permitted full recovery (on a going-forward basis) of: (1) its incremental costs, correctly calculated; (2) joint and common costs; (3) lost contribution (i.e., those amounts used to subsidize other services); (4) with respect to access to unbundled network elements, the full costs of such unbundling; and (5) with respect to resale, prices which reflect

correctly calculated avoided costs.² TCG's proposed agreement fails in these regards.

14. As detailed in its prefiled testimony to be submitted on August 27, 1996, GTEC is not in agreement with a number of TCG's price proposals, including but not limited to:

- a. LATA-wide termination - TCG's proposal does not provide sufficient compensation for inter-tandem transport; GTEC proposes an alternative.
- b. TCG routing points - TCG inappropriately proposes phantom switch locations for compensation purposes; GTEC proposes an alternative.
- c. Collocation discounts - TCG inappropriately proposes discounted pricing for collocation; GTEC will shortly refile its federal collocation tariff, which should be employed for collocation in California. The Commission should note that mandatory physical collocation as provided by the Act constitutes a per se taking of GTEC's property. Loretto v. Teleprompter Manhattan CATV Corp., 458 U.S. 419 (1982); FCC v. Florida Power Corp., 480 U.S. 245 (1987).
- d. Wireless traffic - TCG's proposals for the routing of and compensation for wireless traffic do not provide appropriate compensation; GTEC proposes an alternative.
- e. Access charge revenue sharing - The TCG/Pacific Bell agreement on this issue is peculiar to those companies' negotiation and should not be forced on GTEC; GTEC proposes alternatives keyed to the FCC's access reform efforts.
- f. Transport and termination - TCG's proposed rates do not provide the compensation required by the Act and the Constitution; GTEC proposes alternatives.

2

The Commission should note that even proper pricing and costing under these principles will only provide compensation for the taking or use of GTEC's property on a going-forward basis. In addition, constitutional law requires that GTEC must also be permitted to recover its embedded costs. However, GTEC believes that recovery of these historic costs may be properly resolved in federal and state universal service fund proceedings.

- g. Unbundled network elements - TCG's proposed rates do not provide the compensation required by the Act; GTEC proposes alternatives. The Commission should note that mandatory unbundled access to GTEC's local loop as provided for by the Act constitutes a per se taking of GTEC's property. Loretto, supra; FCC v. Florida Power Corp., supra.
- h. Wholesale discounts - GTEC proposes specific discount levels based on its avoided costs. While the existing and interim discounts set forth in the proposed agreement may be acceptable, these discounts are contingent and this contingency is unacceptable.

DISPUTED ISSUES - OTHER THAN PRICE

15. TCG's proposed agreement covers a large number of operational and administrative matters. In general, GTEC disputes the applicability of the TCG/Pacific Bell Agreement to GTEC and with respect to each and every issue raised by that agreement and GTEC offers its own agreement instead. Recognizing this, GTEC is nevertheless in agreement with certain of TCG's proposed positions, but it cannot agree with several items, including, but not limited to:

- a. LATA-wide termination - Technical limitations make this proposal infeasible; GTEC proposes an alternative.
- b. Meet-point trunking - Technical limitations exist with regard to the proposed passing of Feature Group D signaling for tandem-to-tandem routing of switched access calls; GTEC proposes an alternative.
- c. Intercompany performance standards - While GTEC believes that voluntary performance standards may be negotiated, penalty provisions are inappropriate.
- d. Shared space collocation - TCG's proposal is not required by the Act and must be rejected.

- e. Interconnection arrangements - Certain definitions and operational proposals require clarification or modification to be workable with GTEC's network.
- f. Unbundled network elements - Certain definitions and operational proposals require clarification or modification to be workable with GTEC's network and systems.
- g. Access to poles, conduits and rights of way - GTEC offers an alternative agreement better suited to its operations GTEC reserves its rights on legal issues with regard to apportioning or "sub-letting" rights of way, especially private easements. The Commission should also note that mandatory access to GTEC's poles, ducts, conduits and rights-of-way provided for by 47 U.S.C. § 224, as amended by the Act, constitutes a per se taking of GTEC's property. Loretto, supra; FCC v. Florida Power Corp., supra.
- h. Directory assistance and operator call completion services - Certain definitions and operational proposals require clarification or modification to be workable with GTEC's network and systems.
- i. White page listings - GTEC proposes an alternative.
- j. Number portability - Due to industry-wide implications, the provision of interim and permanent number portability should be deferred to the pending proceedings and efforts of this Commission and the FCC.
- k. Wireless traffic - TCG's proposal for interconnection arrangements for the transport of wireless traffic are not reasonable; GTEC proposes an alternative.
- l. "Additional agreements" - The Commission must reject TCG's position that additional agreements negotiated in the future between TCG and Pacific Bell be automatically applied to GTEC.

IMPLEMENTATION SCHEDULE

16. GTEC and TCG are already physically interconnected for the exchange of local exchange traffic. With regard to other

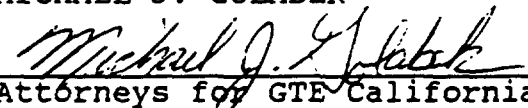
arrangements and intercompany services, GTEC's prefiled testimony will address particular implementation issues and timetables.

CONCLUSION

During the course of this proceeding, GTEC will demonstrate the extent to which TCG's proposals are contrary to the Act. In sharp contrast, GTE's proposals will lead to the development of a competitive telecommunications marketplace where all parties --including ILECs-- have the same opportunities and bear the same responsibilities in providing an essential public service.

Dated: August 26, 1996.


HENRY WEISSMAN
Munger, Tolles & Olson
355 South Grand Avenue
Los Angeles, CA 90071
(213) 683-5150

ELAINE M. LUSTIG
SUSAN D. ROSSI
MICHAEL J. GOLABEK

Attorneys for GTE California
Incorporated
One GTE Place, CA500LB
Thousand Oaks, CA 91362-3811
Tel.: (805) 372-7071
Fax: (805) 373-7515

CERTIFICATE OF SERVICE

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is One GTE Place, CA500LB, Thousand Oaks, California 91362-3811; I have this day served a copy of the attached Response Of GTE California Incorporated (U 1002 C) To Application For Arbitration, on each party or his attorney of record by depositing a copy thereof in a sealed envelope with postage thereon fully prepaid in the United States Mail at Thousand Oaks, California as shown on the attached list.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of August, 1996, at Thousand Oaks, California.


DEBBIE J. WHITSON

Distribution List
A.96-08-013
Page 1

Joseph S. Faber, Esq.
Traci Bone, Esq.
Davis Wright Tremaine
235 Pine Street, Suite 1500
San Francisco, CA 94104

William Harrelson
MCI Telecommunications Corporation
Ninth Floor
201 Spear Street
San Francisco, CA 94105

Earl Nicholas Selby, Esq.
ICG Access Services, Inc.
420 Florence Street
Palo Alto, CA 94301

Deborah S. Waldbaum, Esq.
Teleport Communications Group Inc.
Two Teleport Drive
Staten Island, NY 10311

Steven A. Weissman
Administrative Law Judge
California Public Utilities Commission
505 Van Ness Avenue, Room 5113
San Francisco, CA 94102

Lester Wong
Karen Jones
Commission Advisory and
Compliance Division
Public Utilities Commission
State of California
505 Van Ness Avenue, Room 3-D
San Francisco, CA 94102

CERTIFICATE OF SERVICE

I, Stan Miller, do hereby certify that copies of the foregoing Opposition for a Motion to Stay were sent via first class mail, postage paid, to the following on this 4th day of September, 1996.

Reed E. Hundt**
Chairman
Federal Communication Commission
Room 814
1919 M Street, NW
Washington, DC 20554

James H. Quello**
Commissioner
Federal Communication Commission
Room 802
1919 M Street, NW
Washington, DC 20554

Rachelle E. Chong**
Commissioner
Federal Communication Commission
Room 844
1919 M Street, NW
Washington, DC 20554

Regina Keeney**
Chief, Common Carrier Bureau
Federal Communications Commission
Room 500
1919 M Street, N.W.
Washington, D.C. 20554

Richard Welch**
Chief, Policy and Program Planning
Division
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, D.C. 20554

International Transcription Service**
1919 M Street, NW
Washington, DC 20554

Gloria Shambley** (3)
Common Carrier Bureau
Federal Communications Commission
Network Services Division
Room 235
2000 L Street, N.W.
Washington, D.C. 20554

Mary DeLuca**(2)
Common Carrier Bureau
Federal Communications Commission
Network Services Division
2000 L Street, N.W. , Room 210
Washington, D.C. 20554

Susan P. Ness**
Commissioner
Federal Communications Commission
1919 M Street, N.W. , Room 832
Washington, D.C. 20554

Gerald Matisse**
Chief Network Services Division
Common Carrier Bureau
Federal Communications Commission
2000 M Street, M Street, Room 832
Washington, DC 20554

Kevin C. Gallagher
360° Communications Co.
8725 West Higgins Road
Chicago, IL 60631

Rodney L. Joyce
AD HOC Coalition
1250 Connecticut Avenue, N.W.
Washington, D.C. 20036

Bettye Gardner
Afro-American Life and History, Inc.
1407 Fourteenth St., N.W.
Washington, D.C. 20005

David A. Gross
Kathleen Q. Abernathy
AirTouch Communications, Inc.
1818 N Street, N.W., Suite 800
Washington, D.C. 20036

Mary Newmeyer
John Gardner
Alabama Public Service Commission
P.O. Box 991
Montgomery, Alabama 36101

Don Schroer
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, Alaska 99501

James Rowe
Alaska Telephone Association
4341 B Street, Suite 304
Anchorage, AK 99503

Dr. Barbara O'Connor
Mary Gardiner Jones
Alliance for Public Technology
901 15th Street Suite 230
Washington, D.C. 20005

Curtis T. White
Allied Associated Partners, LP
4201 Connecticut Ave., N.W.
Washington, D.C. 20008-1158

Carolyn C. Hill
ALLTEL Telephone Service Corp.
655 15th Street, N.W., Suite 220
Washington, D.C. 20005

Brad E. Mutschelknaus
Steve A. Augustino
Marieann K. Zochowski
American Communications Servs, Inc.
1200 19th Street, N.W. Suite 500
Washington, D.C. 20036

Alan Dinsmore
American Foundation for the Blind
1615 M Street, N.W., Suite 250
Washington, D.C. 20036

Alan R. Shark
American Mobile Telecommunications Association, Inc.
1150 18th Street, N.W. Suite 250
Washington, D.C. 20036

Danny E. Adams
Steven A. Augustino
American Network Exchange, Inc. and U.S. Long Distance, Inc.
1200 19th Street, N.W., Suite 500
Washington, D.C. 20036

Anne P. Schelle
American Personal Communications
One Democracy Center
6901 Rockledge Drive, Suite 600
Bethesda, MD 20817

Wayne V. Black
C. Douglas Jarrett
Susan M. Hafeli
American Petroleum Institute
1001 G Street, N.W., Suite 500 West
Washington, D.C. 20001

Albert H. Kramer
Robert F. Aldrich
**American Public Communications
Council**
2101 L Street, N.W.
Washington, D.C. 20037

James Baller
Lana Meller
American Public Power Association
1820 Jefferson Place, N.W., Suite 200
Washington, D.C. 20036

Charles H. Helein
**America's Carriers Telecommunication
Assoc.**
8180 Greensboro Drive, Suite 700
McLean, VA 22102

Antoinette Cook Bush
Linda G. Morrison
Ameritech
1440 New York Avenue, N.W.
Washington, D.C. 20005

Paul J. Berman
Alane C. Weixel
Anchorage Telephone Utility
1201 Pennsylvania Ave., N.W.
P.O. Box 7566
Washington, D.C. 20044-7566

Carl W. Northrop
Christine M. Crowe
Arch Communications Group, Inc.
1299 Pennsylvania Ave., N.W., 10th Floor
Washington, D.C. 20004-2400

Christopher C. Kempley
Deborah R. Scott
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Richard J. Metzger
Emily M. Williams
**Association for Local
Telecommunications Servs.**
1200 19th Street, N.W., Suite 560
Washington, D.C. 20036

Mark C. Rosenblum
Roy E. Hoffinger
Stephen C. Garavito
Richard H. Rubin
AT&T Corporation
295 North Maple Avenue
Room 324511
Basking Ridge, New Jersey 07920

James U. Troup
L. Charles Keller
Bay Springs Telephone Co.
1801 K Street, N.W., Suite 400K
Washington, D.C. 20006

Michael E. Glover
Leslie A. Vial
James G. Pachulski
Lydia Pulley
Bell Atlantic
1320 North Court House Road, 8th Fl.
Arlington, VA 22201

John T. Scott, III
Bell Atlantic Nynex Mobile, Inc.
1001 Pennsylvania Ave., N.W.
Washington, D.C. 20004

M. Robert Sutherland
Richard M. Sbaratta
A. Kirven Gilbert III
BellSouth
1155 Peachtree Street, N.E., Ste 1700
Atlanta, GA 30309-3610

Mark J. Palchick
Stephen M. Howard
Buckeye Cablevision
1828 L Street, N.W., Suite 1111
Washington, D.C. 20036

Danny E. Adams
John J. Heitmann
Cable & Wireless, Inc.
1200 19th Street, N.W.
Washington, D.C. 20036

Michael F. Altschul
Randall S. Coleman
**Cellular Telecommunications
Industry Association**
1250 Connecticut Ave., N.W. Suite 200
Washington, D.C. 20036

Richard Rubin
Steven N. Teplitz
Centennial Cellular Corporation
1400 Sixteenth St., N.W. Suite 600
Washington, D.C. 20036

Winston Pittman
Chrysler Minority Dealers Association
27777 Franklin Road, Suite 1105
Southfield, MI 48034

Thomas E. Taylor
Jack B. Harrison
Cincinnati Bell Telephone Company
2500 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202

Richard M. Tettelbaum
Citizens Utilities Company
1400 16th Street, N.W. Suite 500
Washington, D.C. 20036

Norman D. Rasmussen
Colorado Independent Telephone Assoc.
3236 Hiwan Drive
Evergreen, Colorado 80439

Robert J. Hix
Vincent Majkowski
Colorado Public Utilities Commission
1580 Logan Street, Office Level 2
Denver, CO 80203

Terrence P. McGarty
COMAV, Corporation
60 State Street - 2nd Floor
Boston, MA 02109

Howard J. Symons
Cherie R. Kiser
Russell C. Merbeth
COMCAST Corporation
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

Gerald M. Zuckerman
Edward B. Myers
**Communications and Energy
Dispute Resolution Associates**
1825 I Street, N.W. Suite 400
Washington, D.C. 20006

Ronald J. Binz
Debra Berlyn
Competition Policy Institute
1156 15th Street, N.W. Suite 310
Washington, D.C. 20005

Reginald J. Smith
**Connecticut Department of
Public Utility Control**
10 Franklin Square
New Britain, CT 06051

Bradley C. Stillman
Dr. Mark N. Cooper
**Consumer Federation of America
and Consumers Union**
1424 16th Street, N.W., Suite 604
Washington, D.C. 20036

Frank W. Lloyd
Donna N. Lampert
Continental Cablevision, Inc.
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, DC 20004

Werner K. Hartenberger
Leonard J. Kennedy
Laura H. Phillips
J.G. Harrington
Cox Communications, Inc.
1200 New Hampshire Ave., N.W.
Suite 800
Washington, D.C. 20036

**Desoto County, Mississippi
Economic Development Council**
2475 Memphis Street
Hernando, Mississippi 38632

Lawrence Crocker
**District of Columbia
Public Service Commission**
450 Fifth Street, N.W.
Washington, D.C. 20001

David C. Jatlow
Ericsson Corporation
2300 N Street, N.W.
Washington, D.C. 20036

Thomas K. Crowe
Excel Telecommunications, Inc.
2300 M Street, N.W., Suite 800
Washington, D.C. 20037

Cynthia Miller
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Michael J. Shortley, III
Roy L. Morris
Frontier Communications Servs. Inc.
1990 M Street, N.W., Suite 500
Washington, D.C. 20036

B. B. Knowles
Dave Baker
Georgia Public Service Commission
244 Washington Street S.W.
Atlanta, GA 30334-57011

Robert C. Schoonmaker
GVNW Inc./Management
P.O. Box 25969
(2270 La Montana Way)
Colorado Springs, CO 80936 (80918)

Kathy L. Shobert
General Communication, Inc.
901 15th St. N.W., Suite 900
Washington, D.C. 20005

Michael J. Ettner
General Services Administration
18th & F Streets, N.W. Rm. 4002
Washington, D.C. 20405

Maudine Cooper
Greater Washington Urban League
3501 Fourteenth Street, N.W.
Washington, D.C. 20010

William P. Barr
Ward W. Wueste
Gail L. Polivy
GTE Service Corporation
1850 M Street, N.W., Suite 1200
Suite 1200
Washington, D.C. 20036

Eric J. Brantman
Morton J. Posner
GST Telecom, Inc.
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Hart Engineers
Robert A. Hart IV
P.O. Box 6436
Baton Rouge, LA 70896

H. Keith Oliver
Michael S. Fox
Home Telephone Company, Inc.
200 Tram Street
Moncks Corner, SC 29461

Dwight E. Zimmerman
Illinois Independent Telephone Association
RR 13, 24B Oakmont Road
Bloomington, IL 61704

Fiona Branton
Information Technology Industry Council
1250 Eye Street, N.W.
Washington, D.C. 20005

Dana Frix
Hyperion Telecommunications, Inc.
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Myra L. Karegianes
David W. McGann
Illinois Commerce Commission
160 North LaSalle Street, Ste. C-800
Chicago, Illinois 60601

Weldon B. Stutzman
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

Robert C. Glazier
Indiana Utility Regulatory Commission
Indiana Government Center South
302 West Washington, Suite E306
Indianapolis, Indiana 46204

Earl Pace
Black Data Processors Association
1250 Connecticut Avenue, N.W.
Suite 610
Washington, D.C. 20036

Albert H. Kramer
Robert F. Aldrich
Attorneys for
Intelcom Group (U.S.A.), Inc.
2101 L Street, N.W.
Washington, D.C. 20037-1526

Jonathan E. Canis
Reed Smith Shaw & McClay
Intermedia Communications, Inc.
1301 K Street, N.W.
Suite 1100 East Tower
Washington DC 20005

William H. Smith, Jr.
Iowa Utilities Board
Lucas State Office Building
Des Moines, Iowa 50319

Christopher W. Savage
Navid C. Haghighi
Jones Intercable, Inc.
Cole, Raywid & Braverman, L.L.P.
1919 Pennsylvania Avenue, N.W.
Suite 200
Washington, D.C. 20006

Timothy E. Welch
Bogue, Kansas
1330 New Hampshire Ave., N.W.
Suite #113
Washington, D.C. 20036

David Heinemann
Julie Thomas Bowles
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604

Amy E. Dougherty
Kentucky Public Service Commission
730 Schenkel Lane
P.O. Box 615
Frankfort, KY 40602

Robert J. Aamoth
Jonathan E. Canis
LCI International Telecom Corp.
1301 K Street, N.W.
Suite 1100 East Tower
Washington, D.C. 20005

Peter A. Rohrbach
Linda L. Oliver
Kyle Dixon
LDDS WorldCom, Inc.
555 Thirteenth Street, N.W.
Washington, D.C. 20004

Robert A. Mazer
Albert Shuldiner
Mary Pape
**Lincoln Telephone and
Telegraph Company**
1455 Pennsylvania Ave., N.W.
Washington, D.C. 20004-1008

Lawrence St. Blanc
Gayle T. Kellner
Louisiana Public Service Commission
P.O. Box 91154
Baton Rouge, LA 70821-9154

Stephen R. Rosen
Theodore M. Weitz
Lucent Technologies
475 South Street
Morristown, New Jersey 07962

Joel B. Shifman
Maine uPublic Utilities Commission
242 State Street
18 State House Station
Augusta, Maine 04333-0018

Bryan G. Moorhouse
Susan Stevens Miller
Maryland Public Service Commission
6 St. Paul Street
Baltimore, Maryland 21202

Scott Harshbarger
Daniel Mitchell
**Commonwealth of Massachusetts
Office of Attorney General**
200 Portland Street, 4th Floor
Boston, MA 02114

John B. Howe
Mary Clark Webster
Janet Gail Besser
Commonwealth of Massachusetts
Department of Public Utilities
100 Cambridge Street, 12th Floor
Boston, MA 02202

Andrew D. Lipman
Russell M. Blau
MFS Communications Co., Inc.
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Greg Berberich
Matanuska Telephone Association, Inc.
12110 Business Blvd.
Eagle River, Alaska 99577

Henry M. Rivera
Larry S. Solomon
J. Thomas Nolan
Metricom, Inc.
1250 Connecticut Ave., N.W.
Washington, D.C. 20036

Glen A. Schmiede
Mark J. Burzych
Michigan Exchange Carriers
Association
313 South Washington Square
Lansing, MI 48933

William J. Celio
Ronald G. Choura
Michigan Public Service Commission
6545 Mercantile Way
Lansing, MI 48910

Richard J. Johnson
Michael J. Bradley
Minnesota Independent Coalition
4800 Norwest Center
90 South Seventh Street
Minneapolis, MN 55402-4129

Harold Crumpton
Commissioner of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Eric Witte
Attorney for the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Gene P. Belardi
MobileMedia Communications, Inc.
2101 Wilson Boulevard, Suite 935
Arlington, Virginia 22201

James N. Horwood
Scott H. Strauss
Wendy S. Lader
Municipal Utilities
1350 New York Avenue, N.W.
Suite 1100
Washington, D.C. 20005-4798

Aliceann Wohlbruck
National Association of
Development Organizations
444 North Capitol Street, N.W.
Suite 630
Washington, D.C. 20001

Martha S. Hogerty
**National Association of State
Utility Consumer Advocates**
1133 15th Street, N.W. Suite 550
Washington, D.C. 20005

John Crump
National Bar Association
1225 11th Street, N.W.
Washington, D.C. 20001-4217

Daniel L. Brenner
Neal M. Goldberg
David L. Nicoll
**National Cable Television
Association, Inc.**
1724 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Douglas L. Povich
National Wireless Resellers Assoc.
1101 30th Street, N.W., Suite 300
Washington, D.C. 20007

Ann Kutter
Douglas Elfner
**New York State Consumer
Protection Board**
99 Washington Avenue, Ste. 1020
Albany, NY 12210

Maureen O. Helmer
**New York State Department
of Public Service**
Three Empire State Plaza
Albany, New York 12223

Robert S. Foosaner
Lawrence R. Krevor
Laura L. Holloway
Nextel Communications, Inc.
800 Connecticut Ave., NW, Ste. 1001
Washington, D.C. 20006

Daniel Waggoner
NextLink Communications, L.L.C.
2600 Century Square
1501 Fourth Avenue
Seattle, Washington 98101-1688

Bruce Hagen
Susan E. Wefald
Leo M. Reinbold
**North Dakota Public Service
Commission**
North Dakota Public Service
State Capital - 12th Floor
Bismarck, North Dakota 58505-0480

Antoinette R. Wike
North Carolina Utilities Commission
430 North Salisbury Street
Post Office Box 29520
Raleigh, North Carolina 27626-0520

Stephen L. Goodman
Northern Telecom Inc.
1100 New York Avenue, N.W.
Suite 650, East Tower
Washington, D.C. 20005

William J. Balcerski
Saul Fisher
NYNEX Telephone Companies
1111 Westchester Avenue
White Plains, NY 10604

David C. Bergmann
Thomas J. O'Brien
**Office of the Ohio Consumer's
Counsel**
77 South High Street, 15th Floor
Columbus, OH 43266-0550

Steven T. Nourse
Jodi Jenkins Bair
**Public Utilities Commission
Of Ohio**
180 East Broad Street
Columbus, Ohio 43266-0573

Cody L. Graves
Bob Anthony
Ed Apple
Oklahoma Corporation Commission
P.O. Box 25000-2000
Oklahoma City, OK 73152-2000

Mark J. Tauber
Mark J. O'Connor
Omnipoint Corporation
Piper & Marbury, L.L.P.
1200 19th Street, N.W., 7th Floor
Washington, D.C. 20036

Roger Hamilton
Ron Eachus
Joan Smith
Oregon Public Utility Commission
550 Capital Street N.E.
Salem, Oregon 97310-1380

Marlin D. Ard
Randall E. Cape
John W. Bogy
Pacific Telesis Group
140 New Montgomery Street
Rm. 1530A, Fifteenth Floor
San Francisco, California 94105

Judith St. Ledger-Roty
Paul G. Madison
Paging Network, Inc.
1301 K Street, N.W.
Suite 1100 - East Tower
Washington, D.C. 20005-3317

Maureen A. Scott
Veronica A. Smith
John F. Povilaitis
**Pennsylvania Public Utility
Commission**
P.O. Box 3265
Harrisburg, PA 17105-3265

Mark J. Golden
Robert R. Cohen
**Personal Communications
Industry Association**
500 Montgomery St., Suite 700
Alexandria, VA 22314-1561

Jerome K. Blask
Daniel E. Smith
Pronet Inc.
1400 Sixteenth St., N.W., Ste 500
Washington, D.C. 20036

Joe D. Edge
Richard J. Arsenault
Tina M. Pidgeon
Puerto Rico Telephone Company
901 Fifteenth Street, N.W.
Washington, D.C. 20005

Richard N. Koch
Richard N. Koch
10 Lilac Street
Sharon, MA 02067

George Petrutsas
Paul J. Feldman
Roseville Telephone Company
1300 North 17th St., 11th Floor
Rosslyn, VA 22209